

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

MOOG, INC.,

Plaintiff,

v.

SKYRYSE, INC., ROBERT ALIN
PILKINGTON, MISOOK KIM, and DOES NOS.
1-50.

Defendants.

Civil Action No.
1:22-cv-00187-LJV-JJM

NOTICE OF MOTION TO SEAL

PLEASE TAKE NOTICE that Defendant Skyryse, Inc. respectfully submits this motion for an order to file under seal limited excerpts of the Declaration of C. Douglass Locke, Ph.D. filed in support of Skyryse's August 17, 2022 Opposition to Moog's Motion to Compel Discovery Necessary for Further Trade Secret Identification and Production of Documents.

The Locke Declaration references file paths and file names from devices produced to iDS, which are presumptive designated as "OUTSIDE COUNSEL AND ATTORNEYS' EYES ONLY" under the iDS Protocol.

This Motion is based on the Declaration of Arman Zahoory in Support of the Motion to Seal.

Dated: August 17, 2022

By: /s/ Gabriel S. Gross

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